

# *Application Guidelines*



*Michigan Voluntary Protection Programs;  
Management, Labor and MIOSHA  
Working Together*

# **MVPP Contact Information**

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(Revised 3-02)

# **The Michigan Voluntary Protection Programs (MVPP)**

## **Application Guidelines**

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# **The Michigan Voluntary Protection Programs (MVPP)**

## **What is the MVPP?**

MVPP is a recognition and partnership program designed for worksites that implement outstanding systems to manage worker safety and health. The managers, employees, and any authorized representatives at these sites voluntarily implement comprehensive safety and health management systems that go beyond basic compliance with MIOSHA standards.

There are two levels of recognition in the MVPP. Applicants can apply for either the **Michigan Star** program or the **Rising Star** program. The highest level of recognition that can be achieved through the MVPP is the Star award. Establishments that do not yet meet the rigorous requirements of the Star program may qualify for the Rising Star program. Rising Star sites have the desire and potential to achieve Star status within one to three years. Exemptions from programmed inspections are granted for both Star and Rising Star sites.

## **Background**

The philosophy of the Michigan Occupational Safety and Health Administration (MIOSHA) has been to incorporate strong voluntary compliance programs along with fair enforcement efforts. The MVPP continues emphasis on the importance of worksite safety and health worker protection systems in meeting the goals of MIOSHA, Public Act 154 of 1974, as amended, to provide safe and healthful work environments that are free from recognized hazards. The MIOSHA administering agency is the Bureau of Safety and Regulation in the Department of Consumer and Industry Services.

The MVPP is implemented under Section 54 of the Act which directs the agency to develop and maintain education, training and outreach programs which encourage employers and employees and their organizations to reduce hazards, institute new programs, and improve existing programs in providing safe and healthy working conditions.

Participation in the MVPP is not intended to increase the liability of any party in an approved MVPP site. Employees or any representatives of employees participating in a MVPP safety and health management system are not assuming the employer's statutory or common law responsibilities for providing a safe and healthy workplace or, undertaking in any way to guarantee a safe and healthful work environment.

## **General Information**

The MVPP is based upon a philosophy of trust and cooperation exhibited by all parties. Working together, all involved parties strive for accomplishments beyond the basic requirements of Act 154. However, participation in the program does not diminish employer or employee rights or responsibilities under the Act.

MIOSHA will continue to investigate valid, formal employee safety and health complaints, all fatalities and catastrophes, and significant accidents and chemical spills or leaks.

Compliance with the Act and the standards set under the Act is mandatory. However, MIOSHA realizes that even the best of workplaces may occasionally be out of compliance with the standards. It is expected that applicants will take steps to identify these non-conformities and correct them as soon as possible. It is further expected that Star participants be on the leading edge of hazard prevention and make continual improvements in the safety and health management systems in their workplace.

Companies that successfully meet the requirements of the MVPP will be expected to be a mentor for others who want to improve their health and safety management system. Their programs and systems may also be used as models or examples for others. The MIOSHA staff and MVPP participants work together to develop innovative solutions to safety and health concerns.

### **Overview of the MVPP Process**

- A. An applicant must demonstrate that their site is operating an effective occupational safety and health management system characterized by the following basic elements listed below.
  - *Management Leadership*
  - *Employee Involvement*
  - *Worksite Analysis*
  - *Hazard Prevention and Control*
  - *Safety and Health Training*
- B. Employees must be actively engaged in the site's safety and health management system, work with management to ensure a safe and healthful workplace and agree to provide support for the site's MVPP application. Collective bargaining representatives must provide written support for the MVPP application.
- C. The site must have injury and illness incidence rates below the industry average.
- D. Potential sites meeting the initial eligibility requirements must submit an application for the Michigan Star or Rising Star program describing their system of worker protection.
- E. MIOSHA evaluates the application. If the application is accepted, the MVPP Team conducts an onsite review to verify that the system meets MVPP requirements. With approval comes MIOSHA's public recognition of the applicant's outstanding safety and health management system.
- F. MIOSHA periodically conducts follow-up onsite visits when needed. Current MVPP Star participants undergo a reevaluation to confirm the site's continuing

qualification for MVPP every 30-42 months after approval, and subsequently every three years. Rising Star participants are reevaluated within 18-24 months following approval to assure their progress toward established goals in reaching Star level recognition.

### **Terms of Participation**

- A. All Michigan industries who successfully meet the initial MVPP requirements can apply, (except Standard Industrial Classification (SIC) codes 15, 16, & 17). All elements of the applicant's safety and health management system must have been implemented for a period of not less than 12 months prior to application for the MVPP.
- B. Applicants can apply for either the Michigan Star program or the Rising Star program.
  - 1. The *Michigan Star* program is the highest level of acknowledgment that can be achieved through the MVPP. The Michigan Star recognition is awarded to those companies whose health and safety management systems are outstanding, comprehensive, and successful in reducing workplace hazards.
  - 2. The *Rising Star* program is for companies that do not yet meet all of the rigorous requirements of the Star program. This program provides the "stepping stone" for those companies that have the desire, potential and commitment to achieve Michigan Star.
- C. The MVPP has separate data requirements for the Star program and the Rising Star Program.

- 1. *Michigan Star Data Requirements*

One of the criteria for the MVPP star award requires an applicant to be below the industry average for the Total Case Incidence Rate (TCIR) for *each* of the last three complete years. The TCIR is the frequency rate for all recordable injuries and illnesses. The applicant must also be below the industry average for the total case rate related to Days Away from work/Restricted work/or job Transfer (DART), for *each* of the last three complete calendar years. This rate is referred to as the DART rate.

The applicant's (4-digit SIC code) injury and illness rates will be compared to industry average rates published through the MIOSHA Information Division (MID). If Michigan data is unavailable, the comparison will be made to the Bureau of Labor Statistics (BLS) data. If 4-digit SIC code injury and illness industry average rates are unavailable, then 3-digit SIC codes will be used (MID, and if unavailable, BLS). The last three complete years of data will be compared to each corresponding year for which data is available. The latest data from MID and BLS may be one year behind the actual year completed. In this case the most recent data available will be used to compare the last two years.

2. *Rising Star Data Requirements*

Applicants must have injury and illness data *at or below* the specific industry average for two out of the last three complete calendar years. Use Michigan data as described above and if unavailable use BLS data.

3. *Sources for Data Comparisons*

The following sources for data comparison will be obtained from:

- a. Occupational Injury and Illness Incidence Rates by Industry, published for Michigan by the MIOSHA Information Division (MID). This information is available on the MIOSHA web page at [www.cis.state.mi.us/bsr](http://www.cis.state.mi.us/bsr).
- b. Occupational Injuries and Illness in the United States by Industry, published by the Bureau of Labor Statistics (BLS) for federal OSHA. This information is available on the OSHA.gov web page. This information is also available from the CET office.

- D. Some applicants, usually smaller worksites with limited number of employees and/or employee hours worked, may be eligible for an alternative method for calculating incidence rates. The alternative method allows the employer to use the best three out of the most recent four complete years' injury and illness experience. Contact the Consultation Education and Training Division at (517) 322-1809 for further details.
- E. Worksites operating less than three years may be considered for the Rising Star program if the following conditions are met:
1. The applicant's TCIR and the DART rates for at least the first two years of operations, must be at or below the most recent injury and illness incidence rates for Michigan industry averages. If Michigan data is unavailable, use BLS data.
  2. The parent applicant must be able to demonstrate an overall commitment to an effective workplace safety and health management system. In addition, the elements of a safety and health management system must have been in place for at least one year.
  3. The applicant must be able to demonstrate their potential and commitment to achieve Star status within the following two to three years.
- F. The Bureau Director determines final approval for participation in the MVPP. To recognize participation in the MVPP, flags (for Star participants only) and plaques of approval will be awarded. Participants may also choose to use

program logos on such items as letterhead or awards for employees.

- G. Participation in the MVPP is contingent upon continued excellence in administering safety and health management systems and favorable triennial evaluation.

### **Application Submission**

Applications for MVPP must be submitted to the MVPP Manager at the Michigan Department of Consumer and Industry Services, Bureau of Safety and Regulation, Consultation Education and Training Division. Specific instructions for preparing an application begin on page 13.

An initial review of the application is made to determine whether the site meets the eligibility requirements documented in the submitted application. The applicant will be given the opportunity to amend the application with additional or substitute materials for the purpose of improving or clarifying information in the application. A preliminary onsite visit may be conducted by the MVPP staff to ensure initial eligibility requirements have been met.

All applications submitted must contain a written statement of support for the MVPP process from all collective bargaining representatives at the site. Where the site is part of a corporation, individual applications must be submitted for each site.

When the application is accepted as complete by the MVPP manager, the onsite review will be scheduled.

### **Application Withdrawal**

Any applicant may withdraw a submitted application at any time during the process. Once an application has been withdrawn, a new submission of an application is required to be reconsidered for participation in the MVPP.

If the application is substantially incomplete, and if after notification the applicant has not responded within 30 working days to the request for more information, the application will be considered unacceptable and returned to the site. The site may resubmit the application when it is complete.

### **Onsite Review**

The onsite review is an evaluation of the site-specific safety and health management system. A team of MVPP staff conducts this review at the applicant's site. The review is conducted to:

- A. Verify the information supplied in the application concerning qualification for MVPP.
- B. Identify the strengths and weaknesses of the applicant's safety and health management system.



- C. Determine the adequacy of the safety and health management system to address the potential hazards of the site.
- D. Obtain information to assist the Bureau Director in making the final decision for MVPP participation.

The onsite review will be arranged at the mutual convenience of the applicant and the onsite review team. The onsite review team will consist of occupational safety consultants and industrial hygiene consultants. The size of the site and complexity of the safety and health management system will determine the size of the team. The amount of time needed to conduct the onsite review will also depend upon the size of the site. The onsite review will last approximately three to five days.

The onsite review will include an analysis of injury and illness records and recalculation of the rates submitted with the application. The review will verify that the safety and health management system described in the application has been implemented and in place for at least one year. A general assessment of safety and health conditions will determine if the safety and health management system adequately protects workers from the potential hazards at the site.

The review will also include interviews with members of joint labor and management committees, other safety and health committees, management personnel, and randomly selected non-supervisory personnel, including contract workers.

The onsite review team will look at the following documentation:

- A. Written safety and health management system.
- B. Management's statement of commitment to safety and health.
- C. Applicant's safety and health policy, goals, and objectives.
- D. MIOSHA Injury and Illness Log, first aid logs, workers' compensation first report of injury, and employee medical records (if available at the site) for the last three complete calendar years and the year-to-date (for the site and applicable contractors).
- E. Report(s) identifying potential health hazards and industrial hygiene sampling records, including medical surveillance records.
- F. Types of training conducted for: safety and health committees, MIOSHA recordkeepers, and employees involved in self-inspection techniques. Other required safety and health training for specific jobs will be reviewed as well as training attendance records.

- G. Routine self-inspections, frequency of inspections, who conducts the inspections and the tracking system to assure corrections are completed.
- H. Forms for accident reports and near-miss incidents. A tracking system for assuring corrections are made and follow up performed to prevent reoccurrence.
- I. Forms for employee reports of hazard and employee suggestions that include a system for tracking and follow up.
- J. Preventive maintenance records.
- K. Plant safety and health rules.
- L. Written emergency procedures.
- M. Personal protective equipment assessment and implemented program.
- N. Required written programs such as hazard communication, control of hazardous energy, process safety management (PSM), and respirator program.
- O. Safety and health committee minutes (where applicable).
- P. Evidence of line accountability (management performance evaluations, reward and disciplinary systems, budget accountability, etc.).
- Q. Contractor safety program, including injury and illness data for all contractors' working at the applicant's site.
- R. Internal audits or evaluations of the entire safety and health management system, including analysis of progress toward statistical and structural/programmatic goals.
- S. Hazard review and analysis documentation such as process reviews and/or job safety analyses.
- T. A list of all hazardous chemicals at the site.
- U. Copies of all information required under the PSM standard, including process reviews and analyses that examine possible failure points.
- V. Any other documentation relating to the site's safety and health management system.

### **Hazard Correction Plan**

At the conclusion of the onsite review, if the applicant needs to take actions or correct hazards to meet requirements for the MVPP, a hazard correction plan will be developed

with the applicant. A reasonable time, generally 30 working days, will be allowed for those actions to be taken before a recommendation for approval is made to the Bureau Director. Where necessary, a second onsite visit will be made to verify hazards have been controlled or eliminated.

### **Application Approval**

If the review team recommends that the applicant has met the qualifications and requirements of the MVPP, the team's recommendation will be submitted to the MVPP Manager and MVPP Coordinator.

The MVPP Coordinator will then submit the team's recommendation to the Bureau Director for final determination. Approval becomes effective on the day that the Bureau Director signs the letter of approval.

### **Application Denial**

If it is determined that the applicant cannot meet the requirements for participation in the MVPP, or for any reason does not wish to continue the application process, reasonable time (approximately 15 working days) will be allowed for application withdrawal before a denial recommendation is made.

Should an applicant disagree with the onsite review team's recommendation that qualification has not been met, the applicant can file an appeal to the Bureau Director.

If the Bureau Director accepts the recommendation to deny approval, the denial will occur on the date the MVPP Coordinator signs a letter informing the applicant of the decision.

### **Enforcement Referrals**

The cooperative spirit embellished in the MVPP creates an expectation that safety and health hazards discovered during the MVPP onsite review get resolved. Nevertheless, MIOSHA must reserve the right, where employees' safety and health are seriously endangered and site management refuses to correct the situation, to refer the situation to the Bureau Director for review and enforcement action.

The employer will be informed in advance that a referral will be made to the Bureau Director, and that enforcement action may result. It is important, however, for interested employers and employees to be aware of and understand MIOSHA's obligation in the event that such a situation should occur.

If an applicant in this situation does not choose to withdraw from consideration or participation, the Bureau Director may deny or terminate participation effective on the date the Bureau Director declares the cooperative spirit not to exist.

### **Star Site Reevaluation**

Annually, by February 15, each participating MVPP site must submit to the MVPP Manager, the previous years' injury and illness incidence data, a written evaluation of the

site's safety and health management system, a summary of mentoring activities and any MVPP success stories.

MVPP Star participants will undergo a site reevaluation every three years (except when the identification of potential serious problems creates the need for an earlier reevaluation). The reevaluation of MVPP participants will consist mainly of an onsite visit similar in duration and scope to the initial onsite review conducted during the application process. Documentation and verification of continuous improvement of the participant's safety and health management system will be reviewed.

The purpose of the reevaluation is:

- A. To determine continued qualification for the MVPP.
- B. To document outcomes of MVPP participation and success stories.
- C. To identify any problems that have the potential to adversely affect continued MVPP qualification and to determine if those problems require additional evaluations.

The following factors will be used in the reevaluation of MVPP participants:

- A. Continued compliance with the MVPP program requirements.
- B. Level of satisfaction with participation in MVPP.
- C. Nature and validity of any complaints received by MIOSHA.
- D. Nature and resolution of problems that may have come to MIOSHA's attention since approval or the last evaluation.
- E. The effectiveness of employee participation programs.

Three possible recommendations may follow an MVPP evaluation visit:

- A. A recommendation for continued participation in the MVPP.
- B. A recommendation for a one-year conditional Star approval to maintain participation in the MVPP. The MVPP onsite review team may recommend this status if it finds that the site has allowed one or more system elements to slip below Star quality. The site must return its safety and health management system to Star quality within 90 days of the evaluation visit and must demonstrate a commitment to maintain that level of quality for one year. If injury and illness data has increased to above the industry average, a one-year-rate reduction plan must be established. Within one year from the date the goals are implemented, the site must undergo another reevaluation for approval to begin a new cycle as a Michigan Star participant.

- C. A recommendation for termination. The MVPP onsite review team will recommend this action if it finds the site has failed to maintain its safety and health management system at Star quality. A request to the site to withdraw from the MVPP will precede a recommendation for termination to the Bureau Director.

### **Termination**

MVPP status may be revoked for the following reasons:

- A. Sale of the a MVPP site to another owner or any management change that eradicates or significantly weakens the safety and health management system.
- B. The participating site management, or the duly authorized collective bargaining agent where applicable, may terminate participation for any reason.
- C. The MVPP may terminate participation for cause. Termination from the MVPP will occur when a significant failure to maintain the safety and health management system in accordance with the program requirements has been identified.

The MVPP participant will be provided a 15 working-days notice of intent to terminate participation unless:

- A. Other terms for termination were agreed upon before approval.
- B. The deadline for approval has expired.
- C. Evidence is presented that the trust and cooperation among labor, management, and MIOSHA, upon which the approval was based, no longer exists.

Reapplication from terminated sites will not be considered for a period of three years from the date of termination.

### **Reinstatement**

Reinstatement requires reapplication.

# MVPP Application Instructions

Establishments that wish to apply for either the Michigan Star or Rising Star program must submit a formal application. The following guide is designed for you to use as a workbook in evaluating and taking notes about your current workplace safety and health management system. These notes form the basis for your responses to the application questions.

Please review the three sections in the application thoroughly before responding to the questions. Where existing policies, guidelines, forms, and procedures describe your programs and systems, they should be attached as appendices rather than writing new materials for this application. These documents should include the date they were originated because of the MVPP requirement to have a system in place one year prior to submitting an application.

## Section I

This section contains general information specific to the site applying for the MVPP. Each item is numbered. Please reference the numbering system in your responses to the questions to help speed the review of your application.

## Section II

This section contains the request for data from your MIOSHA Injury and Illness logs, applicable contractor data and employee hours worked. In this section you will need to calculate your Total Case Incidence Rate (TCIR) and total case rate related to Days Away from work/Restricted work/or job Transfer (DART rate).

## Section III

This section is the major focus of the application. It contains the key elements and sub-elements of a comprehensive safety and health management system:

- A. Management Leadership
- B. Employee Involvement
- C. Worksite Analysis
- D. Hazard Prevention and Control
- E. Safety and Health Training

In this section you are asked to describe your safety and health management system. Utilizing a team approach may be helpful in preparing your application. Team members who are the most knowledgeable about your systems and programs can provide the detailed responses needed to adequately answer the questions.

As you organize and prepare your application, you will be providing an overview of your site's safety and health activities. This overview will give you a better understanding of your safety and health management system's existing strengths and weaknesses and encourages continuous improvements in your program.

## **Section I - General Information**

### **A. Site/Applicant Name**

Site Address:

Mailing Address (if different from site address):

Site Manger:

(Name and Title)

Site MVPP Contact:

(Name and Title)

Telephone Number(s):

e-mail address:

### **B. Applicant/Corporate Name: (if different from above)**

Corporate MVPP Contact: (if applicable)

(Name and Title)

Address:

Telephone Number:

e-mail address:

### **C. Collective Bargaining Agent(s) (list all)**

Union name and number of local chapter:

Union Contact:

(Name and Title)

Address(es):

Telephone Number:

e-mail address:

**Authorized Employee Representative(s) (non-union)**

(Name and Title)

Address(es):

Telephone Number(s):

e-mail address:

### **D. Number of Employees**

Regular Site Employees:

Temporary and Contract Employees

(that are used routinely on the site, and are under applicant's *direct* supervision)

Total of Site Employees and Temporary/Contract employees:

**E. Type of Work Per formed and Products Produced:**

**F. Standard Industrial Classification 4- Digit (SIC) Code for site:**

**G. Applicable Contractors:**

List all contractors (those who have employees who have worked 1,000 hours or more in any calendar quarter on the applicant's site) and their 4-digit SIC code. Applicable contractors *directly* supervise their own employees.

**H. Indicate which program in the MVPP you are applying for:**  
(Michigan Star program or Rising Star program)

## **Section II - Injury and Illness Data**

For regular site employees, provide the data requested in charts 1 and 2 for each of the last three complete calendar years (see page 16). Employee hours worked for regular site employees shall reflect all full and part-time regular site employees including seasonal and temporary contract employees directly under the applicant's supervision, including administrative, supervisory, clerical and overtime. Small employers, (see page 6) may use the best three out of the previous four years. Rising Star applicants use the best two out of the last three complete years.

Provide the data requested in charts 3 and 4 for all applicable contractors, (those contractors whose employees worked 1,000 or more hours on your site in any calendar quarter during the last three years). Combine data for contractors that have the same SIC code. Prepare a separate chart for each contractor SIC code.

The Total Case Incidence Rate (TCIR) is the frequency rate for all recordable injuries and illnesses. To calculate your TCIR:

$$\text{TCIR} = \frac{\text{Total Number of Recordable Injuries and Illness} \times 200,000}{\text{Total Hours Worked by all Employees during the Calendar Year}}$$



The DART rate is the total case rate related to (Days Away from work/Restricted work/or job Transfer). To calculate your DART rate:

**DART Rate=**

$$\frac{\text{Total Number of Cases Involving (Days Away from Work/Restricted Work/or job Transfer)} \times 200,000}{\text{Total Hours Worked by all Employees during the Calendar Year}}$$

200,000 = Equivalent of 100 full-time employees working 40-hour weeks 50 weeks per year.

Compare your injury and illness incidence rates (for your 4-digit SIC code) to the MIOSHA Information Division (MID) industry average rate. If 4-digit SIC code data is unavailable, use the Bureau of Labor Statistics (BLS) data. If 4-digit BLS SIC code data is unavailable, use 3-digit data (first check MID data and if unavailable, use BLS data).

*Note:* Prior to year 2002, the MIOSHA recordkeeping system and data will be available for Lost Work Day Case Rate (LWDCR). When BLS changes from SIC code system to the North American Industry Classification system (NAICS), MVPP participant's site rates will be compared with the rates generated under NAICS.

**Chart 1**

**Site SIC Code: Regular Site Employees: Injury and Illness Data**

Year	Employee Hours Worked	Total # of Recordable Injuries & Illnesses	TCIR	Michigan Industry Average	BLS Industry Average

**Chart 2**

**Regular Site Employees: Days Away from Work/ Restricted Work /or Job Transfer Case Data referred to as the DART Rate (previously known as Lost WorkDay Case Rate)**

Year	Employee Hours Worked	Total # of Cases Involving Days Away/Restricted Work/or Job Transfer	DART Rate	Michigan Industry Average	BLS Industry Average

**Chart 3**

**Applicable Contractor: Injury and Illness Total Case Incidence Data**

**SIC Code:** \_\_\_\_\_

Year	Employee Hours Worked	Total # of Recordable Injuries & Illnesses	TCIR	Michigan Industry Average	BLS Industry Average

**Chart 4**

**Applicable Contractor: Injury and Illness Total Case Data Involving Days Away from Work/Restricted Work/or Job Transfer)**

Year	Employee Hours Worked	Total # of Cases Days Away/ Restricted Work or Job Transfer	DART Rate	Michigan Industry Average	BLS Industry Average

### **Section III Elements of a Safety and Health Management System**

This section outlines an effective safety and health management system that provides for employee involvement in recognizing the potential hazards of the workplace. It also includes the prevention and/or control of hazards, and the training to ensure that employees at all levels understand these potential hazards and how to help protect themselves and others.

Please respond to the elements and sub-elements listed below describing your site's safety and health management system.

#### **A. Management Leadership**

This element describes the leadership that management provides to encourage all employees in the workplace to be involved in safety and health. Many of the actions listed under this element are measures that apply to all phases of business management.

1. ***Commitment to Safety and Health Protection***

Describe how top management is visibly involved in the safety and health management system and how management sets an example of safe and healthful behavior. Describe how the site has created an environment that allows employees reasonable access to top management.

- a. The safety and health policy should be a clear statement so employees understand the priority of safety and health protection in relation to other organizational values. Who developed your management safety and health policy? How is your policy communicated to employees? Attach a copy of your top-level safety and health policy specific to your facility.
- b. Management must clearly demonstrate commitment to meeting and maintaining the requirements of the MVPP. Attach a statement of commitment to MVPP participation. If the site is unionized, the authorized collective bargaining agent(s) for each unit must either sign the application or submit a signed statement indicating that the collective bargaining agent(s) support MVPP participation. Such concurrence from all authorized agents is required as part of the application. See Appendix A, page 24 for a sample statement regarding management commitment to safety and health and to participation in the MVPP. To review a summary of assurances MVPP sites must agree to, see Appendix B, page 27.

2. ***Organization***

Describe how your site's safety and health function fits into your overall management organization. Attach an organizational chart explaining the relationship of your site's safety and health personnel to your overall organization.

3. ***Responsibility***

Everyone in the workplace should have some responsibility for safety and health. Describe how your site assigns and communicates safety and health responsibility to line supervisors and staff. Include examples of specific responsibilities.

4. ***Accountability***

How are individuals who have been assigned responsibility for safety and health, held personally accountable for achieving what is expected? Describe your accountability system used to hold managers, line supervisors, and employees responsible for safety and health. Examples may include job performance evaluations, warning notices, job descriptions that include safety and health criteria, and contract language. Attach samples of this documentation.

5. ***Resources***

Describe how adequate resources are provided (time, training, personnel,

equipment, budget, and access to information and experts) to the safety and health management system. Describe the safety and health professional staff available, including use of certified safety professionals (CSP), certified industrial hygienists (CIH), other licensed health care professionals, and other experts as needed, based on the risks at your site. Identify any external resources (including corporate office and private consultants) used to help with your safety and health management system.

**6. *Goals and Planning***

- a. Describe the current goal(s) for your safety and health management system with results-oriented objectives for meeting that goal. Describe how management establishes and communicates the goals and objectives so that all members understand the desired results?
- b. Describe how safety and health are part of your overall management planning, (overall management planning relates to such activities as setting production goals, increasing or decreasing the workforce and introducing a new product line, etc.).

**7. *Contractor Safety and Health Program***

- a. Briefly describe the contractor selection process and the contractor oversight and management systems in place at the site. Does this method include consideration of contractor safety and health programs and injury performance as well as the ability to remove a contractor and/or his employees from the site for safety and health violations?
- b. Describe the means used to ensure prompt correction and control of hazards, however detected, under a contractor's control.
- c. Describe methods used to ensure all injuries and illnesses occurring during work performed under a contract are recorded and submitted to you.

**8. *Safety and Health Program Evaluation – Self-Evaluation***

- a. Provide a copy of the most recent annual self-evaluation of your safety and health management system. Include assessments of the effectiveness of the MVPP elements listed in these application guidelines, recommendations for improvement, and assignment of responsibility.
- b. Describe how you perform the evaluation. For example, who evaluates the program, at what time of year, how is the evaluation report distributed and how are people held accountable to ensure the recommendations from the evaluation are accomplished?
- c. Describe how the recommendations from the annual program evaluation are integrated into the safety and health objectives for the next year.

9. ***Site Map***

Please attach a site map or general facility layout.

**B. Employee Involvement**

1. ***How are employees involved in your safety and health management system?***

- a. List at least three meaningful ways employees are involved in your safety and health management system. Provide specific information about decision processes that employees have the potential to impact, such as hazard assessment, inspections, accident investigations, safety and health training, and/or evaluation of the safety and health management system.
- b. Provide information about your safety and health committee (if applicable). Give the date the committee was formed, describe the methods(s) for selecting employee members, and length of service requirements. Describe committee meeting requirements, such as frequency, quorum rules and whether minutes are kept. Describe the committee's role in the site's safety and health management system, such as frequency and scope of committee inspections, role in accident investigations, and role in hazard notifications.
- c. Describe hazard recognition training or other specific training for committee members or any non-managerial employees with duties involving hazard recognition and self-inspections.

2. ***Employee Notification***

Describe how you notify employees about site participation in the MVPP, their right to register a complaint with MIOSHA, and their right to obtain reports of inspections and accident investigations upon request. (Various methods may include new employee orientation; Intranet or e-mail, (if all employees have access); bulletin boards; toolbox talks; or group meetings.)

**C. Worksite Analysis**

1. ***Pre-Use Analysis***

Explain how new or significantly modified equipment, materials, processes and facilities are analyzed for potential hazards prior to purchase and use. Attach documentation such as preliminary hazard analyses, process hazard analyses, or management of change forms.

2. ***Baseline Hazard Analysis - Comprehensive Surveys***

Describe the methods used for baseline hazard analysis to identify hazards associated with your specific work environment, for example, air contaminants, noise, or lead.

3. ***Self-Inspections***

Describe your routine safety and health general inspection procedures. Indicate who performs inspections and how you track any hazards until they are eliminated or controlled. For routine health inspections, summarize the testing and analysis procedures used and qualifications of personnel who conduct them. Include forms used for self-inspections.

4. ***Hazard Analysis for Routine Jobs, Tasks, and Processes***

Describe the system utilized for examination and analysis of safety and health hazards associated with routine tasks, job, processes, and/or phases. How are the results incorporated into your training and hazard prevention and control programs? Include procedures or guidance techniques used in conducting these hazard analyses. You should base priorities for hazard analysis on historical evidence, perceived risks, complexity, and frequency of jobs/tasks completed at your worksite. For those working with complex processes and/or highly hazardous chemicals, describe your process safety management program.

5. ***Employee Reports of Hazards***

Describe how employees notify management of potential safety and health hazards. The reporting system must include protection from reprisal, timely and adequate response, and correction of identified hazards. An opportunity to use a written form to notify management about safety and health hazards must be part of your program. Attach a copy of your form.

6. ***Accident and Incident Investigations***

Describe your written procedures for investigation of accidents, near misses, first-aid cases, and other incidents. What training do investigators receive? How do you determine which accidents or incidents warrant investigations? Are near-miss incidents investigated? Describe the “lessons learned” process being used at the site and demonstrate root cause analyses.

7. ***Pattern Analysis***

Describe the system you use for analyzing trends in your injury and illness experience and hazards identified at your worksite. Indicate how you collect and analyze data from all sources, including injuries, illnesses, near-misses, first-aid cases, work order forms, incident investigations, inspections, and self-audits. Describe how results are disseminated and used.

**D. Hazard Prevention and Control**

1. ***Engineering Controls***

Describe and provide examples of engineering controls you have implemented that helped eliminate or minimize hazards by reducing their severity, their likelihood of occurrence, or both. Engineering controls include, for example, reduction in pressure or amount of hazardous material, substitution of less

hazardous material, noise controls, fail-safe design, leak before burst, fault tolerance/redundancy, local exhaust ventilation, and ergonomic design changes.

2. ***Administrative Controls***

Describe ways you limit daily exposure to hazards by adjusting work schedules or work tasks, for example job rotation.

3. ***Personal Protective Equipment***

Describe and provide examples of your site's personal protective equipment requirements. Describe your process for selecting, using, maintaining and distributing personal protective equipment. If respirators are used, attach or list components of your written respirator program. The entire program will be reviewed during the onsite visit.

4. ***Safety and Health Rules***

Describe your general safety and health rules. Demonstrate that there is a system for equitably enforcing the disciplinary system for managers, supervisors, and employees. How are employees informed about the safety and health rules?

5. ***Preventive/Predictive Maintenance***

Summarize and briefly describe your system for monitoring and maintaining workplace equipment to predict and prevent equipment breakdowns that may cause hazards. Include information about the types of equipment covered, scheduling and how the maintenance timetable is followed.

6. ***Emergency Preparedness***

Describe your site's emergency planning and preparedness system. Provide information on the frequency of emergency drills, training provided, and evacuations. Describe how credible scenarios are chosen for emergency drills and their relationship to site-specific hazards.

7. ***Occupational Health/Medical Care Program***

Describe your onsite and offsite medical service and physician availability. Explain how you utilize the services of licensed occupational health care professionals in routine hazard analyses, in recognizing and treating injuries and illnesses, in limiting severity of harm and in managing injury and illness cases. Indicate the coverage provided by employees trained in first aid, CPR, and other paramedical skills, their training, and available equipment. Describe how you address specific medical care programs required in your hearing conservation program, respirator program and bloodborne infectious diseases.

E. **Safety and Health Training**

Describe the formal and informal safety and health training provided to supervisors, and employees. Identify training protocols, schedules and information provided to supervisors and employees on programs such as hazard communication, personal protective equipment and handling of emergency

situations. Describe testing you use to ensure employees understand and retain course information. Describe how you verify the effectiveness of the training given. Describe how and where training records are kept. Provide examples of documented attendance and tracking methods for assuring all required training is conducted. Describe how top-level managers are trained for safety and health responsibilities.

**F. Other Information**

Include any other information considered relevant in describing your safety and health management system.



# Appendix A

## Sample

### Michigan Voluntary Protection Program Statement of Commitment

#### A. Employee Statement

1. If your site is unionized, the authorized collective bargaining agent(s) must sign a statement that supports the site's participation in MVPP. The statement should be submitted with your application and must be on file before MVPP will schedule an onsite visit. Expressions of the commitment of nonunion employees are encouraged.
2. If your site is non-unionized, and an "authorized employee representative" or "representative of the employee" as defined by the Michigan Occupational Safety and Health Act (MIOSHA) exists, that representative must sign a statement, or at least indicate support for the site's participation in MVPP. This statement must be on file prior to an onsite evaluation.

#### B. Management Statement

Please read the following statements carefully and either sign on the line following the Statement of Commitment or attach a letter that provides the same assurances.

We agree that:

1. We are committed to doing our best to provide outstanding safety and health protection to our employees through management systems and employee involvement;
2. All employees, including newly hired employees and contract employees when they reach the site, will have the MVPP explained to them, including employee rights under the program and under MIOSHA;
3. All hazards identified through employee notification, self-inspections, accident investigations, process hazard reviews, annual evaluations, or any other means or report, investigation, or analysis will be corrected in a timely manner, with interim protection provided as necessary;
4. If employees are given health and safety duties as part of our safety and health program, we will ensure that those employees will be protected from discriminatory actions resulting from their carrying out such duties, just as the Michigan Occupational Safety and Health Act (P.A. 154 of 1974, as amended) protects employees for the exercise of rights under the Act; and

5. Employees will have access to the results of self-inspections and accident investigations upon request.

### **C. Documentation**

We agree to provide the following information for the MVPP's onsite review:

1. Written safety and health programs, (if applicable);
2. All of the following documentation:
  - a. Management statement of commitment to safety and health
  - b. MIOSHA Injury and Illness log and supplemental information
  - c. Safety and health manual(s)
  - d. Employee notifications system for reporting safety and health hazards
  - e. Safety rules, emergency procedures, and examples of safe work practices
  - f. System for enforcing safety rules
  - g. Self-inspection procedures, reports and system for tracking corrections
  - h. Accident investigations
  - i. Safety committee minutes
  - j. Industrial hygiene monitoring records
  - k. Other records which provide documentation to meet MVPP program requirements.
3. Any agreements between management and collective bargaining agent(s) or other authorized employee representative(s) concerning the functions of any joint labor-management safety and health committee and its organization and any other employee involvement in the safety and health management system.

We will retain these records until the MVPP communicates its decision regarding our approval to participate.

We will likewise retain comparable records for the period of MVPP participation to be covered by each subsequent reevaluation until MVPP communicates its decision regarding approval.

We agree to make available for evaluation purposes any data necessary to evaluate other achievement of goals not listed above.

We will provide to MIOSHA, each year by February 15th the number of our injury and illness cases, number of cases involving days away from work/restricted work and/or job transfer, incidence rates, hours worked, estimated average employment for the past full calendar year, and a copy of the most recent annual written evaluation of the site's safety and health management system.

In addition, we will submit applicable contractor's number of combined injury and illness cases, number of cases involving days away from work/restricted work and/or job transfer, incidence rates, hours worked, and estimated average employment for the past full calendar year for all contractors' employees who worked at least 1000 hours in any one quarter at our site during the year.

We understand it is important that we continue to be a leader within our community and to assist other applicant's at our discretion with knowledge and resources pertaining to both safety and health.

We will make available to the MVPR any education and training materials that are not considered confidential so that our experience in safety and health training can be shared with other Michigan companies.

We understand that we may withdraw our application or participation at any time or for any reason should we so desire.

Authorized Signature (For Applicant Worksite)

Date:

(You may add the signatures of any others you wish.)

## **Appendix B**

### **Michigan Voluntary Protection Programs (MVPP) Assurances**

*An MVPP participant agrees to:*

1. Comply with the Act and correct all hazards discovered in a timely manner.
2. Correct site deficiencies related to the MVPP onsite review within 30 days.
3. Obtain employee/collective bargaining written support of the MVPP application and process.
4. Meet and maintain the required MVPP elements for an effective safety and health management system.
5. Explain the MVPP to newly hired and contract employees, including employee rights under the program.
6. Protect employees who are given safety and health responsibilities from discriminatory actions resulting from their carrying out such duties.
7. Allow employees access to the results of self-inspections, accident investigations, and other safety and health program data upon request.
8. Make available to the onsite Team the written safety and health management system; all documentation needed to conduct an initial onsite review; and any agreements between management and the collective bargaining agent(s) concerning safety and health.
9. Make available any necessary data to assist in the evaluation or reevaluation of established goals for Rising Star applicants, one-year conditional Star goals, and current Star sites.
10. Submit by February 15 the following information annually: (a) data related to Total Case Incidence Rate (TCIR) and cases related to Days Away from work/Restricted work/or job Transfer case Rate (DART rate), (b) a written evaluation of the site's safety and health management system, worksite success stories, and a summary of mentoring experiences.
11. Submit by February 15 data related to TCIR and DART rate for contractor's employees who have worked a total of 1,000 or more hours in any calendar quarter at the worksite.

12. Advise the MVPP Manager if any significant organizational or ownership changes within 60 days and provide an new Statement of Commitment signed by management and any authorized collective bargaining agents.
13. Advise the MVPP Manager if a change has occurred in the authorized bargaining agent and provide a new signed statement of support for MVPP participation form the new representative.
14. Participate in mentoring activities to assist other establishments with meeting MVPP criteria.

## Appendix C

<b>MVPP REQUIREMENTS CHECKLIST</b>			
<b>STAR REQUIREMENTS</b> (Minimum Merit requirements are denoted by an *)	<b>Fully Met</b>	<b>Needs to be Completed or Adjusted before Approval</b>	<b>Cannot be Fully Met before Approval – Needs Goal</b>
*MIOSHA inspection/interaction record indicates good faith and exemption level criteria related to inspection schedule.			
*Written and signed employer assurances received.			
<i>*Where unionized, a signed written statement of support or signed MVPP application received from the authorized collective bargaining agent(s).</i>  If a labor organization has not been certified, or if no organization has a collective bargaining relationship with the employer, the “authorized employee representative(s)”, or the representative(s) of the employees means a person(s) designated by the employees to represent them.			
<b>PROGRAM REQUIREMENTS</b>			
One year of quality experience with all elements is required to quality for Star.			
<b>RECORDKEEPING</b>			
Total Case Incidence Rates (TCIR) and cases related to Days Away from work/Restricted work/or job Transfers (DART rate) for each of the most recent three calendar years below Michigan or U.S. average for 4-digit SIC codes, if available.			
<b>MANAGEMENT LEADERSHIP AND EMPLOYEE INVOLVEMENT</b>			
Safety and health planning integrated with overall management planning. Safety and health is part of the planning process for changes in equipment, materials, processes, and in construction phases.			
*Established policies and objectives communicated to all employees, including contract employees.			
Authority and responsibility clearly defined and implemented.			
Line managers and supervisors are held accountable for safety and health through an effective evaluation process. (In construction – at least project manager and contractor superintendents).			
Good performance rewarded. Poor performance corrected.			
Adequate resources in people and equipment available.			
Top management visible, accessible, and setting example.			

<b>Management Leadership and Employee Involvement (continued)</b> Contract workers are covered by the same or an equally effective safety and health program.			
Annual program evaluation conducted, including: A written report, Written recommendations, and Documented follow-ups to recommendations.			
<b>EMPLOYEE INVOLVEMENT</b>			
*Employees are involved in all elements of the safety and health program in a manner that has a demonstrable impact on decision-making.			
<b>WORKSITE ANALYSIS (HAZARD ASSESSMENT PROGRAM)</b>			
*Baseline industrial hygiene survey with written report or system of process review.			
*Industrial hygiene monitoring and sampling, laboratory analysis planned and implemented as necessary.			
*Monitoring and sampling done in accordance with nationally recognized procedures.			
*Laboratory analysis of samples done in accordance with nationally recognized procedures.			
*Routine self-inspections with written reports and hazard correction tracking: (1) Procedures are in place (2) Monthly inspections with quarterly coverages of whole site (general industry) in place for one year.			
Routine hazard review such as process review or job safety analysis. Results in improved safe work procedures and/or employee training.			
*Reliable system for employees to notify management about hazards: (1) Receive adequate and timely response. (2) System includes written notification and tracking of hazards.			
*Accident investigation system: (1) With written reports. (2) With hazard correction and tracking. (3) Procedures are in writing.			
Analysis of injury, illness and other related records to determine if any patterns exist, and if patterns identified, develop plans to address the patterns.			

<b>HAZARD PREVENTION &amp; CONTROL PROGRAMS</b>			
Reasonable access to certified industrial hygiene, safety and health care professionals.			
*Safety and health rules are written and enforced.			
Written safe work practices are in place			
*Disciplinary system for breaking rules involving safety and health.			
Written emergency procedures implemented that include: (1) Any necessary PPE. (2) First aid and occupational health planning. (3) Emergency egress plans and evacuation procedures. (4) Emergency telephone numbers provided. (5) Plans for conducting emergency drills.			
*Effectively implemented program for preventive and routine maintenance of all equipment.			
*Occupational health program with, at least, first aid onsite and quick access to health care services that provide adequate occupational health protection for all employees.			
<b>SAFETY &amp; HEALTH TRAINING</b>			
*Employees receive safety and health training as required.			
Managers understand their safety and health responsibilities.			
Supervisors know and understand policies, rules, and procedures to prevent hazard exposure.			
Supervisors use training and discipline to ensure that employees follow rules and work experiences.			
Employees are trained in safe work practices as they learn new jobs.			
Supervisors and employees know what to do in emergencies.			
Emergency drills are run periodically, at least annually.			
<i>PPE is used, employees know it is required, why it is required, how to use it, what its limitations are, and how to maintain it.</i>			
Employee use PPE properly.			